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June 30, 2005

## **VIA ELECTRONIC FILING**

Marlene H. Dortch, Esq. Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: MB Docket No. 03-15

WJTV-DT, Jackson, Mississippi (Facility ID No. 48667)

FCC File No. BPCDT-19991025AEF

Request for Waiver of July 1, 2005 Replication/Maximization Deadline

Dear Ms. Dortch:

Media General Communications, Inc. ("Media General"), permittee of television station WJTV-DT (Jackson, Mississippi) (the "Station"), by its attorneys, hereby requests waiver of the Commission's July 1, 2005 replication/maximization interference protection deadline. Due to circumstances beyond its control, Media General has been unable to implement its authorized full power facilities for the Station (See FCC File No. BPCDT-19991025AEF).

In its Second DTV Periodic Review Report and Order, the Commission adopted a July 1, 2005 replication/maximization interference protection deadline for DTV licensees affiliated with the top-four networks in the top 100-ranked designated market areas. If a station subject to this deadline had not completed construction of its replication or maximization facilities by this date it would lose interference protection to the unserved area. The Commission further stated that, in cases where a station was unable to meet the applicable deadline due to "severe financial constraints or circumstances beyond a station's control," the Commission would "establish a limited waiver process and grant extensions of the applicable replication or maximization interference protection deadline on a six-month basis if good cause is shown." To receive such a waiver, broadcasters were required to make a showing "similar to that required to obtain a waiver of the DTV construction deadlines."

Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, *Report and Order*, 19 FCC Rcd 18279 (rel. Sept. 7, 2004).

<sup>&</sup>lt;sup>2</sup> Id.,¶ 87. See also *Public Notice*, DTV Channel Election Issues – Compliance with the July 1, 2005 Replication Maximization Interference Protection deadline; Stations Seeking Extension of the Deadline, DA 05-1636 (rel. June 15, 2005).

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Media General has been unable to implement its full power facilities for WJTV-DT due to reasons beyond its control. Coast to Coast Towers ("Coast to Coast"), the contractor employed by Media General to install the Station's permanent DTV antenna and transmission line, says it will be unable to complete installation before July 1, 2005 as had been promised. Although Coast to Coast initially informed Media General that it would complete antenna installation in time for full power operations to commence by July 1, capacity issues, as well as emergency repairs required by other stations, have forced Coast to Coast to postpone installation. Coast to Coast says that it will be unable to begin installation until July 11, 2005. Pursuant to a revised schedule, Media General anticipates that it will require approximately thirty days thereafter (i.e., until August 11<sup>th</sup>) to complete installation. Following subsequent construction and system testing, Media General believes it will place the station into operation by August 31, 2005.

Based on the foregoing, Media General believes that it has shown good cause for the Commission to grant a waiver of the maximization/replication deadline for the Station. Media General, in cooperation with Coast to Coast, continues to work diligently to complete all necessary modifications to enable the Station to commence full power operations as soon as possible. Media General has installed the Station's new transmitter, and has the new DTV antenna and transmission line on-site and ready for installation. Yet because Coast to Coast has postponed installation, Media General cannot complete construction by July 1. Accordingly, Media General respectfully requests that the Commission grant a sixty-day waiver of the interference protection deadline for WJTV-DT through and until August 31, 2005.

Respectfully submitted,

Scott S. Patrick

cc: Shaun Maher (FCC)